

because the case is a civil action between citizens of different states wherein the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

3. Defendants have filed this Notice of Removal through the undersigned counsel and Defendants all jointly consent to removal.

BASIS FOR REMOVAL

4. There is complete diversity of the parties. Plaintiff is a resident of Canadian County, State of Oklahoma. Under applicable law, Plaintiff is (both now and when this action was filed) a citizen of the state of Oklahoma. Defendant Union Standard Insurance Group, LLC is a limited liability company formed under the laws of the state of Delaware with its principal place of business at 222 Las Colinas Blvd. W., Suite 1300, Irving, Texas 75039. Defendant Acadia Insurance Group, LLC is a limited liability company formed under the laws of Delaware with a principal place of business at One Acadia Commons, Westbrook, Maine, 04092. Defendant Acadia Insurance Company is a corporation formed under the laws of the state of New Hampshire with a principal place of business One Acadia Commons, Westbrook, Maine, 04092. Under applicable law, all Defendants (both now and when this action was filed) are citizens of the state of Delaware, New Hampshire, Maine, and Texas.

5. Because Plaintiff is a citizen of Oklahoma and Defendants are citizens of Delaware, New Hampshire, Maine and Texas, complete diversity of citizenship exists between the parties pursuant to 28 U.S.C. § 1332.

6. The amount in controversy exceeds \$75,000.00 in this case. In his original Petition, Plaintiff asserts he has suffered harms and losses in excess of \$75,000.00 and Plaintiff also seeks punitive damages in excess of \$75,000.00.

7. Pursuant to 28 U.S.C. § 1446(a) and LCvR 81.2, copies of all process, pleadings and orders served upon Defendants, together with a copy of the docket sheet from the Oklahoma County District Court, are attached as Exhibits 1-4. The docket sheet in Oklahoma County Case No. CJ-2016-3542 is Exhibit 1; Plaintiff's Petition is Exhibit 2; Summons served upon the Oklahoma Insurance Commissioner is Exhibit 3; Defendants' Entry of Appearance and Reservation of Additional Time in Which to Further Answer or Plead is Exhibit 4.

8. Promptly after the filing of this Notice of Removal, Defendants shall give written notice of the removal to Plaintiff, through its attorney of record and to the clerk of the state court as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendants request that this action now pending against it in the District Court of Oklahoma County, State of Oklahoma, be removed to the United States District Court for the Western District of Texas, as an action properly removable thereto and seeks all other relief it may be entitled to.

Respectfully submitted,

s/ Allison J. Maynard
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WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP

ATTORNEY FOR DEFENDANTS UNION
STANDARD INSURANCE GROUP, LLC,
ACADIA INSURANCE GROUP, LLC,
AND ACADIA INSURANCE COMPANY

CERTIFICATE OF SERVICE

This is to certify that on the 6th day of October, 2016, a true and correct copy of the above and foregoing was served by facsimile and first class mail as follows:

Via Facsimile 800-418-8210
and First Class Mail

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Jay Mitchel
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Via Facsimile 405-232-1849
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ATTORNEYS FOR PLAINTIFF

s/ Allison J. Maynard _____
Allison J. Maynard